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Attorneys for Defendant
 UNITED NATIONAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION

SCOTTSDALE INSURANCE
 COMPANY, an Ohio Corporation

Plaintiff,

v.

UNITED NATIONAL INSURANCE
 COMPANY and DOES 1 through 15.

Defendants.

Action No.: C08-03981CW

STIPULATION TO EXTEND DEADLINES
 FOR EXPERT DISCLOSURE AND TO
 COMPLETE MEDIATION; ORDER.

[Local Rules 6-2 and 7-12]

Pursuant to Local Rules 6-2 and 7-12, defendant United National Insurance Company and plaintiff Scottsdale Insurance Company, through the signatures of their respective counsel below, hereby stipulation to continue the deadline for disclosure of expert-witness information from April 30, 2009, to May 30, 2009, and to continue the deadline to complete mediation from May 4, 2009, to June 4, 2009. The parties' request the continuances because they believe that the hearing of the pending cross-motions for summary judgment or partial summary judgment, recently continued by the Court from

1 April 23, 2009, to April 30, 2009, will likely obviate the need for expert disclosure or
2 mediation in this matter, so that continuing both of the relevant dates will likely preclude
3 the unnecessary expenditure of the Court's, the mediator's, and the parties' resources.
4 The dates have not been previously continued, and the parties do not believe their
5 continuance will affect any other deadline in this matter.

6 Respectfully submitted,

7 NIELSEN, HALEY & ABBOTT LLP

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10 April 17, 2009

By: 

Thomas H. Nienow
Attorneys for Defendant
UNITED NATIONAL INSURANCE COMPANY

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14 LOW, BALL & LYNCH

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17 April 17, 2009

By: 

David L. Blinn
Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY

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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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25 April 23, 2009



Honorable Claudia Wilken
UNITED STATES DISTRICT JUDGE

Scottsdale Insurance Company v. United National Ins. Co.

United States District Court, Northern District Court No.: C08-03981 CW

PROOF OF SERVICE

I declare that:

I am a citizen of the United States, employed in the County of San Francisco. I am over the age of eighteen years, and not a party to the within cause. My business address is 44 Montgomery Street, Suite 750, San Francisco, California 94104. On the date set forth below I served the following document(s) described as:

STIPULATION TO EXTEND DEADLINES FOR EXPERT DISCLOSURE AND TO COMPLETE MEDIATION; ORDER

☐ (BY FACSIMILE) by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date.

☐ (BY MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at San Francisco, California.

☐ (BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand this date to the offices of the addressee(s).

☐ (BY OVERNIGHT DELIVERY) I caused such envelope(s) to be delivered to an overnight delivery carrier with delivery fees provided for, addressed to the person(s) on whom it is to be served.

☒ (BY ELECTRONIC SERVICE) by submitting an electronic version of the document(s) to be served on all parties listed on the service list on file with the court as of this date.

Attorney for Plaintiff

Scottsdale Insurance Co., an Ohio Corp.

Joseph M. Fenech, Esq.

Low, Ball & Lynch


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San Francisco, CA 94111

Tel: (415) 891-6630

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on April 17, 2009, at San Francisco, California.


Fatima Bonilla